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December 2, 2021

Via ECF

Honorable Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Macas et al v. K.Y. Young Inc. et al,
Index No. 21-cv-3244 (LJL)

Dear Judge Liman:

This office represents Plaintiffs in the above matter. We write jointly with the Defendants to respectfully request a 60-day extension of the discovery schedule, currently set to end on December 3, 2021.

The reason for this request is that one Plaintiff, Maria Jerez, is in the midst of a move out of state. Due to this, she has not been able to adequately search for documents responsive to the Defendants' discovery requests. Further, the Plaintiffs' firm has recently undergone a change of ownership (see Docket No. 26) as of earlier this month, which has caused a considerable amount of upheaval.

At this time, certain issues which are currently presenting impediments to the amicable resolution of this case may be resolved by the exchange of documents. The Parties thus feel that the opportunity to do so would facilitate a resolution thereof.

The discovery that remains to be completed are the supplementation of the Plaintiffs' Responses to Defendants' First Request for the Production of Documents and the Defendants' supplementation of their responses to the Plaintiffs' First Request for the Production of Documents.

This is the first request of its nature

The parties thank the Court for its consideration of this matter.

Respectfully Submitted,

/s/ Clela Errington
Clela A. Errington, Esq.

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cc: Defendants, via ECF